



**Wisconsin
Right to Life, Inc.**

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FEDERAL ELECTION
COMMISSION
December 8, 1998
DEC 14 1 15 PM '98

Richard Ng
Federal Election Commission
Washington, DC

Dear Mr. Ng,

This letter is response to the December 3 letter from John D. Gibson who has asked us to clarify three items in regard to our 12 Day Pre-Primary Report (7/1/98-8/19/98).

1. Mr. Gibson states that "failure to make payments to your connected organization prior to the use of the mailing list could result in prohibited corporate contributions." Mr. Gibson then asks us to establish that payments were made to our connected organization, Wisconsin Right to Life, Inc., prior to the use of the mailing list by providing the dates that the independent expenditures were made, the dates that the mailing list was used and the dates the connected organization was reimbursed for use of the mailing list.

According to s. 116.2 (e) (2) of the Code of Federal Regulations - Federal Elections, the definition of "Extension of Credit" includes "Any agreement between the creditor and the political committee that the political committee will have additional time to pay the creditor beyond the previously agreed to due date. In this section, "creditor" means "any person or entity to whom a debt is owed."

I also call your attention to s. 116.3 (b) (1) (2) (3). In that section, "Incorporated Vendor" is defined as "A corporation in its capacity as a commercial vendor may extend credit to a candidate, a political committee or another person on behalf of a candidate or political committee provided that the credit is extended in the ordinary course of the corporation's business and the terms of credit to nonpolitical debtors that are of similar risk and size of obligation." This section then sets forth several criteria in order to determine whether an extension of credit is part of the "ordinary course of business."

For years, our connected organization Wisconsin Right to Life, Inc., has rented its mailing list, at fair market value, to numerous federal and state candidates as well as the Wisconsin Right to Life PAC. In all cases, Wisconsin Right to Life, Inc. charges fair market value to those who rent the list with payment expected within 30 days.